



Williams Lake Timber Supply Area Summary of Public Input

B.C. Ministry of Forests

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Williams Lake Timber Supply Area, Summary of Public Input

Williams Lake Timber Supply Area

Timber Supply Review

Summary of Public Input

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This is a summary of the public input that has been received on the Timber Supply Review in the Williams Lake Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the Chief Forester in the allowable annual cut determination.

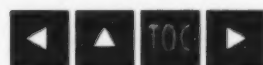


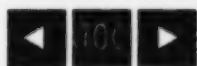


Background

As part of the review of timber supply in the Williams Lake Timber Supply Area, the British Columbia Forest Service distributed a *Discussion Paper* and two technical reports, the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the Chief Forester for his consideration when he reviewed the allowable annual cut for the Williams Lake Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Chilcotin, Horsefly, and Williams Lake Forest District offices.





Public Review Process and Response

Staff from the three districts actively solicited public input on the Timber Supply Review in the Williams Lake Timber Supply Area through the following actions:

- copies of the *Timber Supply Analysis* were sent to the 52 sector representatives of the Commission on Resources and Environment (CORE) Cariboo-Chilcotin Regional Negotiation Table, major licensees, and First Nations
- copies of the *Socio-Economic Analysis* and the *Discussion Paper* were sent to the 52 CORE sector representatives, licensees and First Nations with an invitation to make presentations if requested. The *Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager(s)
- seven open houses were advertised extensively through local newspapers (see Table 1)
- extensive newspaper coverage occurred

As Table 1 shows, over 34 individuals attended the meetings and open houses. The Williams Lake Timber Supply Area staff received one completed response form and 14 written submissions (see Appendix 1). In addition, four form letters and a petition were received, with 873 individual signatures among them. The Cariboo Lumber Manufacturers' Association completed an independent timber supply analysis and this was submitted earlier, in 1994 (referred to as the "industry analysis" in this report).

Location (No. of participants)

Date

Open Houses

Williams Lake (1)	April 24, 1995
Alkali Lake (1)	May 1, 1995
Alexis Creek (2)	May 8, 1995
Tatla Lake (16)	May 9, 1995
Anahim Lake (1)	May 10, 1995
Horsefly Lake (3)	May 10, 1995
Likely (10)	May 11, 1995

Table 1: Participation in public information activities

Prior to the 90-day review, a number of meetings were held with the CORE Cariboo-Chilcotin Regional Negotiation Table, licensees and local interest groups.





Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Williams Lake Timber Supply Area is summarized under the following headings:

- timber supply analysis
- socio-economic analysis
- discussion paper

Public input on the Timber Supply Review process and other ongoing government processes that may influence the timber supply in the Williams Lake Timber Supply Area in the future is summarized at the end of this section.





Timber Supply Analysis

A range of input was received regarding the timber supply analysis, and can be summarized under the following topics:

- **Reliability of inventory data and estimates**

One submission says the use of 1992 forest inventory data is not valid; another questions the quality of the current forest inventory.

- **Site productivity estimates**

One submission states that regeneration success rates will be negatively affected by soil and water table degradation, changing rainfall and climate patterns resulting from extensive clearcutting, especially in the Chilcotin and higher elevation areas.

Another submission cautions that large, single-species plantations may be prone to severe insect and disease outbreaks and maintains this may affect forecasts of regeneration growth. The example of pine needle cast infections in plantations in this timber supply area is given.

An interest group submission maintains the model used in the analysis to predict growth is inadequate to deal with the risk and uncertainty inherent in future predictions. The authors say no scientific research is cited to support the projections made in the analysis.

In addition, this interest group asserts that much of the data and assumptions in the analysis is not accurate and current. They say the detailed information regarding the origin of, the rationale for, and the validity of, current management practices is not provided, yet these status quo management practices form the basis for projected future volume yields.

An individual submission maintains that site productivity losses are occurring because of the reliance on slashing, burning and planting, when natural tree growth would be faster and more reliable.

- **Size of the timber harvesting land base**

Two submissions state that the reduction of 2.5 per cent of the land base for roads is insufficient, and doesn't account for soil degradation on skid roads, trails and landings where vehicle soil compaction and industrial activity occurs. One individual suggests the reduction should be 7.5 to 10 per cent of the timber harvesting land base.

The Ministry of Environment, Lands and Parks submission cites a lack of clarity in the way Pulpwood Agreement 16 was accounted for in the Forest Service analysis. The submission states this agreement

has a very real impact on the location of sawlog cutblocks, due to the requirement that harvested blocks green up before adjacent blocks are harvested.

Ainsworth Lumber Co. Ltd. indicates support for the area reductions within Pulpwood Agreement 16, but notes further analysis is required so this reduction does not translate into a loss of available timber for harvest. The company states it does not support any inclusion of problem forest types into the sawlog harvest land base.

A forest industry submission suggests the problem forest type land base should be defined by measures such as minimum volume per hectare and minimum tree heights. Lignum Ltd. contends that approximately 400 000 hectares of the 700 000 hectares of problem forest type stands (classified as immature or pulpwood) are actually sawlog stands, and therefore should be included in the timber harvesting land base. Lignum says the same principle applies to the three Western Supply Blocks, where they expect the 500 000 hectares of problem forest types to include significant sawlog volumes.

• Wildlife habitat

The exclusion of wildlife habitat from the timber harvesting land base was based on outdated wildlife data, according to one respondent. A comprehensive ecological assessment of habitats is required to ensure adequate habitat for wildlife.

The Ministry of Environment, Lands and Parks says the information used for excluding mule deer habitat was based on 1988 data, which is outdated because of extensive salvage logging in Douglas-fir forests attacked by the fir bark beetle. The ministry submission says estimates of timber volumes from these areas were overestimated and did not contain an allowance for catastrophic events.

An industry submission agrees a re-inventory of mule deer winter range areas is needed in order to develop realistic management plans that recognize the needs of mule deer and the current high level of Douglas-fir bark beetle harvest.

• Insects, disease and fire

One respondent says the European experience of problems with monoculture should make the Forest Service very cautious, and states that no margin of safety for the forest health risks associated with monocultures was built into the Forest Service analysis.

Another claims that about 30 per cent of volume reductions province-wide are due to fire, pests and disease. Despite the efficient salvage and sanitation harvesting occurring in the Williams Lake Timber Supply Area, the one per cent estimated in the Forest Service analysis for unsalvaged losses may be far too low.

An interest group submission says the Forest Service analysis makes no comment on pine needle casts and blights, which are widespread in the Chilcotin. Also, no consideration was given in the analysis to the effects of global warming and climate change on diseases.

According to a forest industry submission, the Forest Service estimate of about 8.6 million cubic metres of mountain pine beetle-killed pine is low. The submission estimates 13 to 14 million cubic metres exist, with four to five million available for harvest. The group says this will support the salvage program for up to five more years at the current rate of harvest. The benefits of this include conversion to managed forests, reduced rehabilitation expenditures, enhancement of multiple uses (especially grazing),

continued employment and contribution to Crown revenues. These significant salvage volumes indicate much is yet to be learned about the management of aging forests over long periods of time, according to the group.

Lignum Ltd. also supports the five-year extension of the beetle-kill licences, based on the above data as well as on their surveys which confirm the merchantability of the dead lodgepole pine.

• Industry analysis

The industry analysis makes the following additional comments about the Forest Service timber supply analysis:

- the Forest Service analysis does not address the fact that, although considerable mature timber is generally available, a very critical shortage is projected to occur between 15 and 35 years from now
- the issuance of cutting permits should not be used as an indicator of timber availability, since permits are affected by other issues such as land use conflicts
- change is the most significant resource management factor that requires study, but the Forest Service analysis has not analyzed the types and extent of changes occurring
- the rapid change in utilization standards is not recognized in the Forest Service analysis. For example, wood previously usable only as pulpwood may now have other uses, yet the pulpwood agreement is tied to a particular land base rather than to the utilization options for the wood within it





Socio-Economic Analysis

- **Employment and community impacts**

Two points of view predominate in the input on this topic:

- two interest group submissions, two forest industry submissions, 767 form letters and the petition state that timber supply area communities, especially Williams Lake, are strongly dependent on the forest industry and therefore reductions in timber supply are incompatible with sustainable development of the area. Optimism is expressed that there is no need to adapt to reduced timber supplies, but that increases in volumes can be anticipated through intensive management and innovative utilization and harvesting techniques. The submissions point out that health, recreational and cultural services depend on support from the corporate forest sector and the volunteer efforts of forest sector employees
- four other interest groups maintain that the livelihoods, options and lifestyles of the 72 per cent of the timber supply area population who don't rely on the forest industry must be protected and respected. Specific comments include:
 - the *Socio-Economic Analysis* implies any changes in forest management will jeopardize our society. This doom-and-gloom approach is not forward-looking and only reflects the status quo. It has also been shown to be false in Revelstoke and Springfield, Oregon
 - residents of small communities in the timber supply area know a simple, export-based economy is not sustainable and are trying to create diversified economies
 - future generations should not pay the price for the short-term benefits the current generation has received from over harvesting and insensitive logging practices. Drastic change must begin now
 - the assumption in the *Socio-Economic Analysis* that basic industry employment supports twice as much indirect employment as non-basic industry (such as agriculture and tourism) is questionable

The forest industry submission expresses the opinion that the contribution of the forest industry to the local and provincial economy is dramatically understated. It offers the following reasons:

- the benefits and taxes from forest sector employment are not considered
- the annual salary generated from seasonal work is not recognized when "number of person-years" is used as a measure of employment
- the inclusion of certain sectors (public sector, unemployment insurance, transfers and income

assistance) in basic employment dilutes the importance of the forest sector. By excluding them, the contribution of forestry to the basic sector rises from 28 per cent to 45 per cent

- "threshold" factors are not considered; proportional reductions in timber supply can only occur to a certain point before processing plants are no longer economical to operate
- the May 1, 1994, stumpage increases should be considered in estimating future government revenues

• Environmental impacts

With regard to fish and wildlife values, the Ministry of Environment, Lands and Parks asserts that maintenance of habitat is the only certain way to protect these populations. The success of other measures proposed in the *Socio-Economic Analysis* (stocking, new regulations) is not assured.

This agency also expresses concern that higher harvest levels will remove older age classes more quickly and may make it difficult to maintain good age distribution and biological connectivity. In the case of dry-belt Douglas-fir, the ministry maintains that seral stage representation over time is unknown because of the difficulty in predicting productivity in selective harvesting situations. The prescription of 50 per cent removal at the first pass, followed by 30-year re-entries, will result in a loss of old-growth attributes and a volume decline over time, according to the ministry.

The forest industry submission points to considerable uncertainty around the issue of older forests. That submission says the fact that 30 per cent of the land base was removed for older forest protection has been ignored in the Timber Supply Review and constraints have been applied to the rest of the land base. Yet, the type of older forest targeted, its locations and a management strategy (or identification of the risks involved in not managing) are not specified. The association expresses a concern with lack of local input on this issue.

The industry submission also says the fact that adaptive planning and harvesting techniques can address caribou concerns is ignored in the Forest Service analysis, leading to exclusions of areas rather than appropriate management of them. Lignum Ltd. claims the withdrawals of caribou habitat are overstated in the analysis. The company suggests that after the year 2008, about 30 per cent of the eastern caribou habitat is anticipated (by agreement) to be available for harvesting, and this should be reflected in the Forest Service analysis. This principle should also apply to western caribou habitat.

• Non-timber resources

According to two submissions, the economic values of other resources was not satisfactorily quantified by the *Socio-Economic Analysis*. The Ministry of Environment, Lands and Parks uses the example of the Horsefly sockeye run, which was not factored into the analysis because it occurs on the Coast. The other submission points to the economic benefits from tourism, trapping, guiding, recreation and retirement industries, and claims that a multiple accounts analysis is required to quantify these benefits.

One interest group submission comments extensively on the *Socio-Economic Analysis*, making the following points:

- population data for the Chilcotin is inaccurate and should be around 4000. This affects socio-economic forecasts substantially

- the assumption that First Nations people will want to increase their involvement in the forest sector is unsubstantiated and questionable
- full-cost accounting or a multiple accounts analysis, rather than a cost-benefit analysis, is required to truly address sustainability
- the provincial and local impact of an anticipated growth in demand for pulp was not considered
- the "jobless growth" of the forest industry means higher social costs (unemployment insurance, social assistance payments)
- maintaining the present allowable annual cut is not cost-efficient for government. Industry no longer pays its way or generates a significant portion of government revenue (only 7.5 per cent of provincial gross domestic product)
- because Williams Lake is a regional centre, indirect employment figures related solely to the Williams Lake Timber Supply Area are likely overestimated, as will be the impacts of any change in timber supply
- for Chilcotin residents, the economic vitality of the tourism and agriculture sectors is more significant than that of forestry. Some research shows tourism and recreation will benefit from reducing the allowable annual cut





Discussion Paper

Several issues raised in the *Discussion Paper* prompted public input.

- **Intensive silviculture and enhanced management**

Two interest group submissions, the form letters, and the petition say that as a result of new land use decisions pending in the timber supply area the potential for enhanced management and incremental silviculture has increased. They particularly note the dedication of Enhanced Resource Development zones, which occupy 40 per cent of the land base in the Cariboo-Chilcotin and offer additional forested area and increased harvest through intensive management.

- **Allowable annual cut adjustment**

Virtually all submissions comment on the level of the annual allowable cut, taking one of two positions:

- **Maintain the allowable annual cut at 2.5 million cubic metres per year**

Because of community dependence on the forest sector and because of pending land-use decisions that will likely lead to increased timber supply, the submissions from two interest groups, the forest industry, Lignum Ltd., the 767 form letters and the petition support the maintenance of the current allowable annual cut.

Because of the economic importance, continuing availability and merchantability of beetle-killed stands, about one third of the form letters received (not including the petition) and two forest industry submissions specifically indicate support for a continuation of the harvest of beetle-killed pine in the West Chilcotin.

Lignum Ltd. says that if any adjustment to timber supply is required, it should be made from the pulpwood agreement because of the company's belief that a significant sawlog component is included within the land of the pulpwood agreement. Lignum's submission suggests a partitioned cut would be an option to allow this volume to be part of the allowable annual cut and yet ensure these problem forest types are harvested.

Lignum Ltd. also maintains a decrease in the allowable annual cut would have a negative impact on the innovative approaches needed to meet both the timber and non-timber goals of sustainability.

- **Reduce the allowable annual cut immediately**

Because of past over-harvesting and poor management practices, as well as pending land-use decisions and the Forest Practices Code, eight submissions support an immediate reduction in the allowable

annual cut to protect non-timber resources (both for economic and conservation reasons) and to achieve a sustainable harvest level that will not cause job loss and instability for future generations.

Four submissions do not indicate a preferred level for a reduced allowable annual cut. Three support an immediate reduction to the long-term timber supply level (2.1 million cubic metres per year). Another says while that level could be acceptable, the effects of past over-harvesting require that a truly sustainable cut would be substantially below 2.1 million cubic metres per year.

One form letter with 163 signatures says the discrepancy between the forest industry timber supply analysis and the Forest Service analysis must be addressed before the allowable annual cut is set. The forest industry submission says further analysis is required to assess the potential contribution of the three western supply blocks to the timber supply, providing net benefit to the Crown and potential stabilization of the allowable annual cut for the whole timber supply area.





Related issues and processes

• Other legislation and planning processes

The *Discussion Paper* specifically states that the results of decisions from the Cariboo-Chilcotin Land-Use Plan and from implementation of the Forest Practices Code are not included in this Timber Supply Review. Nevertheless, almost all submissions state that the effects of these other processes, especially the land-use plan, must be considered before determining an allowable annual cut.

However, input was divided on the outcome if these factors were considered. Two interest group submissions and the form letters and petition are optimistic that the land-use plan, in conjunction with resources made available under Forest Renewal B.C., will result in continuation or an increase in the current allowable annual cut. Five interest groups, one individual, and the Ministry of Environment, Lands and Parks maintain the land-use plan will result in a reduced land base and less timber being available, in order to protect other values such as visual quality, fish and wildlife habitat, biodiversity and water quality. These submissions say it is possible and essential to incorporate the results of these other processes at this time.

The forest industry group, while noting that these other processes were not considered, does not comment on the appropriateness of including them or not.

• The Timber Supply Review process

The Ministry of Environment, Lands and Parks says they were not consulted in the course of the Timber Supply Review and are therefore unable to evaluate which decisions were made on their behalf by the timber supply analysts.

The interest group submission states the Forest Service analysis failed to incorporate many of the recommendations made in the 1991 *Review of the Timber Supply Analysis Process for B.C. Timber Supply Areas*, including better training of Forest Service personnel, identifying and consistently applying management assumptions, and updating analysis procedures, particularly the methods for calculating and interpreting long-run sustained yield. The authors say in their review of the Forest Service analysis, they were unable to verify sources for research methodology and management assumptions and thus felt hampered in their attempt to assess the validity of data used. The group submits that, in general, neither the Forest Service *Timber Supply Analysis* nor the *Socio-Economic Analysis* was independent or objective.

With regard to the *Discussion Paper*, the interest group says it also contains inaccuracies, is not up-to-date, and does not fully integrate all concerns and values. The authors say the *Discussion Paper* provides public information but does not act as a vehicle for genuine public participation in the

allowable annual cut decision-making process.

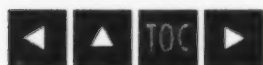
- **Sustainable units**

One individual expresses the opinion that sustainable yield should be based on smaller units, such as forest districts, rather than the entire Williams Lake Timber Supply Area.





Appendix 1





Written Submissions received:

by the Chilcotin, Horsefly and Williams Lake Forest Districts, the Cariboo Forest Region, and the Chief Forester's Office

Government agencies

The Ministry of Environment, Lands and Parks, Habitat Section, Cariboo Region

Industry

Ainsworth Lumber Co. Ltd.

Williams Lake Timber Supply Area Association

Lignum Ltd.

Cariboo Lumber Manufacturers' Association (independent analysis)

Interest groups

Horsefly District Tourism & Ratepayers Association

SHARE Cariboo/Chilcotin Resources

Quesnel River Watershed Alliance

Cariboo-Chilcotin Conservation Council

Sustainable Communities Sector, Commission on Resources and Environment

Cariboo Communities Coalition

Tatlayoko Think Tank

Individuals

Three submissions

Four form letters with 767 signatures

One petition with 106 signatures





